

The Hon. Thomas O. Rice

HEATHER C. YAKELY  
Evans, Craven & Lackie, P.S.  
818 W. Riverside Ave., Suite 250  
Spokane, WA 99201-0910  
(509) 455-5200  
[hyakely@ecl-law.com](mailto:hyakely@ecl-law.com)  
Attorneys for Defendant

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

ERIN FRANKLIN, as an individual  
plaintiff, and the ESTATE OF JOHN  
FRANKLIN, by and through Personal  
Representative Erin Franklin;  
BROCK FRANKLIN, BLAKE  
FRANKLIN, and AVERY  
FRANKLIN,

Plaintiff(s),

vs.

INTER-CON SECURITY  
SYSTEMS, INC, and its Parent  
Company TBD, by and through  
others TBD,

Defendant(s).

Case No. 2:23-cv-00338-TOR

Spokane County Superior Court Case  
No. 23-2-04486-32

NON-OPPOSITION TO  
PLAINTIFFS' MOTION TO  
AMEND COMPLAINT

Defendant, by and through their counsel of record, Heather C. Yakely,  
hereby files its non-opposition to Plaintiffs' Motion to Amend Complaint. While  
Defendant does not agree with facts asserted, contentions raised, or interpretation  
of the law set forth in Plaintiffs' Motion, Defendant believes it is in the interests  
of judicial economy not to oppose the Motion.

NON-OPPOSITION TO PLAINTIFFS' MOTION TO AMEND  
COMPLAINT - page 1

1 DATED: December 22, 2023

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3 EVANS, CRAVEN & LACKIE, P.S.

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5 By   
6 HEATHER C. YAKELY, WSBA #28848  
7 Attorneys for Defendant  
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23 NON-OPPOSITION TO PLAINTIFFS' MOTION TO AMEND  
COMPLAINT - page 2

**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury of the laws of the United States, that on the 22<sup>nd</sup> day of December 2023, the foregoing was served on the following persons as indicated below:

<b><u>Counsel for Plaintiffs</u></b> Mary Schultz Mary Schultz Law, P.S. 2111 E. Red Barn Lane Spangle, WA 99031 Tel: (509) 245-3522, Ext. 1 Email: <a href="mailto:Mary@MSchultz.com">Mary@MSchultz.com</a>	Regular mail, postage prepaid	<input type="checkbox"/>
	Personal delivery	<input type="checkbox"/>
	Email per electronic service agreement	<input checked="" type="checkbox"/>
	Other:	<input type="checkbox"/>

By /s/Heather C. Yakely  
HEATHER C. YAKELY, WSBA #28848  
818 W. Riverside Ave., Ste. 250  
Spokane, WA 99201  
(509) 455-5200  
[hyakely@ecl-law.com](mailto:hyakely@ecl-law.com)  
Attorneys for Defendant